

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,

Plaintiff,

v.

The City of Nashua, New Hampshire, et al.,
Defendants.

No. 22-cv-00326-LM

DECLARATION OF BRIAN T. CORRIGAN, ESQUIRE

I, Brian T. Corrigan, Esquire, make this declaration under the authority of 28 U.S.C. 1746 and state as follows:

1. I am *pro hac vice* counsel to defendants Inception Technologies, Inc. and Raymond Feoli (collectively, the “Defendants”).
2. I make this Declaration based on my own personal knowledge.
3. Following the Court’s June 20, 2023 ruling on Defendants’ Motion to Dismiss, I prepared an Answer to Plaintiff’s Verified Complaint and conferred with prior Local Counsel.
4. Without access to the Court’s e-filing system, I relied on prior Local Counsel to execute e-filings.
5. I did not properly coordinate with and confirm the e-filing by prior Local Counsel who subsequently withdrew from this case without advance warning, forcing me to scramble to find substitute Local Counsel.
6. I subsequently obtained access to the Court’s e-filing system.
7. Upon receipt of Plaintiff’s Motion for Default, I promptly e-filed Defendants’ Answer.

I declare under the pains and penalties of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Dated June 18, 2024

/s/ *Brian T. Corrigan*

Brian T. Corrigan

CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

/s/ *Brian T. Corrigan*

Brian T. Corrigan